SUBJECT INDEX

TABLE OF AUTHORITIES

Cases

IN THE

Supreme Court of the United States

OCTOBER TERM, 1953

No. _____, Original

STATE OF ALABAMA,
Complainant

v.

STATE OF TEXAS; STATE OF LOUISIANA; STATE OF FLORIDA; STATE OF CALIFORNIA; GEORGE M. HUMPHREY; DOUGLAS McKAY; ROBERT B. ANDERSON; IVY BAKER PRIEST.

MOTION FOR LEAVE TO FILE OBJECTIONS

The State of Texas, by its Attorney General, asks leave of the Court to file its objections to the motion filed herein by the State of Alabama for leave of this Court to file its complaint against the State of Texas, the State of Louisiana, the State of Florida, the State of California, George M. Humphrey, Douglas McKay, Robert B. Anderson, and Ivy Baker Priest, which complaint is submitted therewith.

JOHN BEN SHEPPERD
Attorney General of Texas

PRELIMINARY STATEMENT

The State of Texas appears here for the sole purpose of objecting to the motion of the State of Alabama for leave to file complaint.

The first objection presented herein is directed to the point that the complaint which Alabama seeks leave to file presents no case or controversy within the jurisdiction of this Court for the reasons that (1) the complaint presents nothing more than an abstract question of international political power; (2) Alabama is without standing to sue in its sovereign capacity or in the capacity of quasi-sovereign or *parens patriae;* and (3) the complaint, insofar as it relates to the fishing rights of Alabama citizens, presents no controversy between Alabama or its citizens and the State of Texas.

The second objection is that leave to file the complaint should be denied because of the absence of the United States as a party.

FIRST OBJECTION

The Complaint Does Not State a Case or Controversy Within the Jurisdiction of This Court

The Complaint Presents Nothing More Than An Abstract Question of International Political Power

Alabama's principal argument is founded entirely upon alleged unequal treatment of Alabama *vis-a-vis* Texas, Louisiana, and Florida under Public Law 31, Chapter 65, 83rd Congress, First Session, 1953.

Alabama affirmatively states that its boundaries "extend only three nautical miles beyond low water mark on its coast." (Br., p. 17.) The complaint then alleges that the United States Government has determined three nautical miles as the permissible width of this belt pursuant to a rule of international law and that "this rule is binding equally" on Texas, Louisiana, and Florida. (Comp., ¶¶ XI, XIV, XVII.) And, in this connection, Alabama prays that Public Law 31 be declared void insofar as it attempts to confer on Texas, Louisiana, and Florida any rights in "the maritime belt lying seaward between three and nine nautical miles from the ordinary low water mark." (Comp., p. 29, "3".)

Thus, by its own argument Alabama illustrates the connection of this subject matter with international relations and acknowledges that the "Government of the United States" is responsible for determining questions pertaining thereto. Indeed, an important part of Alabama's contention appears to be the anomalous idea that the political departments of the federal government, which have exclusive power over foreign relations, are powerless to determine the policies of the United States with respect to the natural resources in and under the marginal sea.*

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*Alabama's complaint and supporting brief consistently treat the natural resources affected by Public Law 31 separately from the moneys heretofore impounded by federal officials from the proceeds of leases covering the same natural resources. But the legal nature of these "escrow" moneys in no way differs from the legal nature of the resources themselves. Had there been no production, title to the resources now represented by the impounded moneys would have passed under Section 3(a) of the Act. Hence, no analytical advantage can be served by considering these moneys separately from the resources themselves.

Texas submits that Alabama's argument relating to the width of the territorial belt affected by Public Law 31 is, in the last analysis, a naked challenge to the authority of the Congress and the President to conduct foreign affairs, an incident of which is the determination of national boundaries, whether for the limited purposes involved in Public Law 31 or for all purposes. As such it presents a "political" rather than a judicial question.

This Court has so reasoned in a great variety of cases, one group of which is represented by *Foster v. Neilson*, 2 Pet. 253 (1829). In that case each party asserted a title to the same tract of land in Louisiana, the plaintiff alleging a title based on a Spanish grant during 1804. The defense was that such Spanish grants were void due to the fact that Spain had ceded the entire area between the Perdido and Iberville Rivers to France by the Treaty of St. Ildefonso (by which Spain had ceded Louisiana to France) and that this disputed area was acquired by the United States from France in the Louisiana Purchase in 1803. The meaning of the crucial provision of the Treaty, which controlled the lawsuit, was conceded by the Court to be ambiguous and was recognized by the Court to have been the subject of a lengthy dispute between the governments of Spain and the United States, the Spanish construction favoring plaintiff and the American construction favoring defendant.

In affirming a dismissal of the suit, Chief Justice Marshall pointed out that

> "In a controversy between two nations concerning national boundary, it is scarcely possi-

> ble that the courts of either should refuse to abide by the measures adopted by its own government. There being no common tribunal to decide between them, each determines for itself on its own rights, and if they cannot adjust their differences peaceably, the right remains with the strongest. The judiciary is not that department of the government to which the assertion of its interests against foreign powers is confided . . ." (2 Pet. at 307.)

And, after observing the various congressional acts respecting the disputed area, the Court added:—

> ". . . If those departments which are intrusted with the foreign intercourse of the nation, which assert and maintain its interests against foreign powers, have unequivocally asserted its rights of dominion over a country which is in its possession, and which it claims under a treaty; if the legislature has acted on the construction thus asserted, it is not in its own courts that this construction is to be denied. A question like this respecting the boundaries of nations is, as has been truly said, more a political than a legal question; and in its discussion, the courts of every country must respect the pronounced will of the legislature." (*Id.* at 309.)

Subsequent decisions reiterate that national boundary matters present political questions for the executive and legislative departments and that a determination by these "political" departments is binding on the courts. *United States v. Arredondo*, 6 Pet. 691, 711 (1832); *Garcia v. Lee*, 12 Pet. 511, 516 (1838); *United States v. Reynes*, 9 How. 127, 154 (1849); *United States v. Lynde*, 11 Wall. 632,

643 (1870). Insofar as the political, or non-judicial, nature of national boundary making is concerned, these decisions have been properly distinguished from those relied on by Alabama which involve only questions of internal boundary between states or between a state and the United States. See *United States v. Texas*, 143 U. S. 621, 639 (1892).*

Likewise, this Court in *United States v. California*, 332 U.S. 19, 34 (1947), with reference to the identical international frontier here involved, acknowledged the binding effect upon the judiciary of assertions by the political departments of dominion over the marginal seas and the binding effect of delineations by those departments of the geographical limits of such dominion. The Court's reliance upon the principles approved in *Jones v. United States*, 137 U.S. 202, 212-214 (1890), and *In re Cooper*, 143 U.S. 472, 502-503 (1892), supports Texas' conviction that questions of boundary making in the marginal sea are indistinguishable from foreign relations issues in general and that the determination of all such issues by the political departments conclusively binds the courts and removes those questions from the scope of judicial power delegated by Article III of the Constitution. *Chicago & S. Air Lines, Inc. v. Waterman Steamship Corp.*, 333 U.S. 103, 111 (1948); *Z. & F. Assets Realization Corp. v. Hull*, 311 U.S. 470, 490 (1941) (concurring opinion); *Wilson*

*If any further distinction of Alabama's internal boundary cases is required, it should be noted that each of them concerned a boundary of the complaining state—a matter of immediate and special interest to it—whereas, in the present case, Alabama is complaining about certain boundaries of Texas, Louisiana, and Florida—boundaries that have nothing whatever to do with Alabama's jurisdiction.

v. Shaw, 204 U.S. 24, 32 (1907); *Terlinden v. Ames*, 184 U.S. 270, 288 (1902); *The Chinese Exclusion Case*, 130 U.S. 581 (1889). See Field, *The Doctrine of Political Questions In The Federal Courts*, 8 MINN. L. REV. 485, 494-502 (1924); Weston, *Political Questions*, 38 HARV. L. REV. 296, 315-316 (1925).

As if in answer to Alabama's present argument that the former "law of the land" (Br., p. 21) restricted the national boundary in the Gulf of Mexico to three miles and that the Congress may not modify this boundary for any purpose, this Court long ago remarked in the case last cited:

> ". . . The question whether our government is justified in disregarding its engagements with another nation is not one for the determination of the courts." (130 U.S. at 602.)

Moreover, since it is the ultimate responsibility of this Court to determine who may invoke its jurisdiction and under what circumstances, it is well within the Court's power to dismiss for lack of jurisdiction any action before it which presents only a political question. *Chicago & S. Air Lines, Inc. v. Waterman Steamship Corp.*, *supra*; *Massachusetts v. Mellon*, 262 U.S. 447 (1923); *Georgia v. Stanton*, 6 Wall. 50 (1867). See *Coleman v. Miller*, 307 U.S. 433, 456, 460 (1939) (concurring opinions); *Z. & F. Assets Realization Corp. v. Hull*, *supra* at 490 (concurring opinion).

That the Court should exercise judicial self-limitation in this instance and should deny Alabama leave to file is manifest from the action of the Court in respect to analogous political questions discussed above.

Alabama Has No Standing In Its Sovereign Capacity To Question The Constitutionality Of Public Law 31

That a state as a sovereign has no authority to question the provisions of Public Law 31 relating to the extent of the territorial belt established for the purpose of developing the natural resources in and under the marginal sea was recognized in principle in *United States v. California*, 332 U.S. 19, 35 (1947), where the Court said:

> ". . . whatever any nation does in the open sea, which detracts from its common usefulness to nations, or which another nation may charge detracts from it, is a question for consideration among nations as such, and not their separate governmental units."

Therefore, any rights asserted by Texas under Public Law 31 to the natural resources in and under the portion of the marginal sea within its historic boundaries could not possibly be in derogation of the rights, if any, of the State of Alabama, whatever the nature of the rights claimed by Alabama. The extent of the territorial belt in which Texas asserts its rights to the natural resources is a matter solely between Texas and the federal government. It is submitted, therefore, that no legal rights of Alabama have been invaded by the alleged assertions of Texas.

Under such circumstances it is clear that Alabama's complaint presents no actual controversy for determination by this Court. As stated in *Massachusetts v. Missouri*, 308 U.S. 1, 15 (1939), for there

to be a justiciable controversy "it must appear that the complaining State has suffered a wrong through the action of the other State, furnishing ground for judicial redress, or is asserting a right against the other State which is susceptible of judicial enforcement according to the accepted principles of the common law or equity systems of jurisprudence."

Even if it could be said that Alabama has suffered injury by the alleged acts of the State of Texas under Public Law 31, it is apparent that this injury is one that is suffered by Alabama in common with all the states of the Union and therefore affords no basis for the action which Alabama seeks to bring. This principal was established in *Frothingham v. Mellon*, 262 U.S. 447, 488 (1923), where it was said:

> ". . . We have no power *per se* to review and annul acts of Congress on the ground that they are unconstitutional. That question may be considered only when the justification for some direct injury suffered or threatened, presenting a justiciable issue, is made to rest upon such an act. Then the power exercised is that of ascertaining and declaring the law applicable to the controversy. It amounts to little more than the negative power to disregard an unconstitutional enactment, which otherwise would stand in the way of the enforcement of a legal right. The party who invokes the power must be able to show not only that the statute is invalid but that he has sustained or is immediately in danger of sustaining some direct injury as the result of its enforcement, and not merely that he suffers in some indefinite way in common with people generally."

Alabama argues further that its sovereign interests are adversely affected by the claims of Texas, Louisiana, Florida, and California with respect to the natural resources in and under any portion of the marginal sea. The basis of this additional contention is the idea that national sovereign interests have been actually and improperly delegated to these states by Public Law 31, because it is alleged that national sovereign interests are inseparably tied to and therefore must follow the proprietary interests expressly confirmed in the states by Public Law 31. (Comp., ¶ XXXIV A; Br., pp. 24-26.) This idea appears to be derived from Alabama's construction of this Court's holding in *United States v. Texas*, 339 U.S. 707 (1950). Texas denies that the holding of the Court in that case is properly subject to the construction which Alabama seeks to place upon it.

However, even if the opinion of the Court in the *Texas* case were properly susceptible of that construction, Texas is unable to perceive how this would confer any sovereign capacity to complain on the State of Alabama, a purely local sovereign. Even if it could be said that these property rights in and to the natural resources of the marginal sea are inseparable from the national sovereign, the national sovereign would hold these rights for the benefit of all the people and not for the individual states as such. This was expressly recognized in the opinion of this Court in *United States v. California*, 332 U.S. 19, 40, where, in reference to the identical interests here involved, it was said that "the Government . . . holds its interests here as elsewhere in trust for *all the people*." Alabama's status as a local sovereign is no way

gives it any standing to bring a suit to enforce rights held for "all the people." Alabama's repeated allegations that these rights are held in trust for "all of the *states*" as well as "all the people" are without legal precedent and certainly cannot change the nature of the federal government's responsibility, whatever it is. But if there is any such "trust" for "all the people," Congress alone may determine how it shall be enforced and administered. *United States v. San Francisco*, 310 U.S. 16, 29-30 (1940).

Alabama Is Without Standing To Question The Constitutionality of Public Law 31 On Behalf Of Its Citizens

Assuming, *arguendo*, that the requisite injury to Alabama citizens by the enactment of Public Law 31 were established, the State of Alabama would have no standing to enforce rights of its citizens by challenging the constitutionality of the Act. Such an action is precluded by prior decisions of this Court.

In *Massachusetts v. Mellon*, 262 U.S. 447, this Court held that an attack upon the constitutionality of a federal statute by a state on behalf of its citizens is not a "justiciable controversy." There, Massachusetts, asserting that it had standing to bring the suit in its sovereign capacity and also in a capacity of representative or as *parens patriae* of its citizens, sought to challenge the constitutionality of the Maternity Act. In denying the right of Massachusetts to bring the suit, the Court said:

> "... But the citizens of Massachusetts are also citizens of the United States. It cannot be

conceded that a State, as *parens patriae*, may institute judicial proceedings to protect citizens of the United States from the operation of the statutes thereof. While the State, under some circumstances, may sue in that capacity for the protection of its citizens (*Missouri v. Illinois*, 180 U. S. 208, 241), it is no part of its duty or power to enforce their rights in respect of their relations with the Federal Government. In that field it is the United States, and not the State, which represents them as *parens patriae*, when such representation becomes appropriate; and to the former, and not to the latter, they must look for such protective measures as flow from that status." (262 U. S. at 485-486.)

This principle that a state does not have standing to attack the validity of a federal statute on behalf of its citizens was reiterated and strengthened by this Court in *Florida v. Mellon*, 273 U. S. 12 (1927). In that case, Florida sought to attack the constitutionality of a federal inheritance tax law, suing as representative of her citizens. Even though it was pointed out that there were only three states whose citizens could be adversely affected by this federal statute and that there was no way in which Florida could secure the same benefits for her citizens as were given citizens of other states (273 U. S. at 16), the Court said:

"Nor can the suit be maintained by the state because of any injury to its citizens. They are also citizens of the United States and subject to its laws. In respect of their relations with the

federal government 'it is the United States, and not the State, which represents them as *parens patriæ*, when such representation becomes appropriate; and to the former, and not to the latter, they must look for such protective measures as flow from that status.' *Massachusetts v. Mellon*, supra, pp. 485-486." (273 U. S. at 18.)

Alabama relies heavily upon *Georgia v. Pennsylvania R.R.*, 324 U.S. 439 (1945), in an attempt to escape the application of the principle clearly enunciated in *Massachusetts v. Mellon* and *Florida v. Mellon*. But *Georgia v. Pennsylvania R.R.* did not involve an attack by the State of Georgia on behalf of its citizens upon the constitutionality of a federal statute. In fact, it was just the opposite. There, Georgia was asserting rights *based on a federal statute* in seeking to protect its citizens from a price-fixing conspiracy, while here Alabama is attacking the validity of a federal statute.

It is significant that in *Georgia v. Pennsylvania R. R.* the Court expressly recognized this distinction between an "attack" upon a federal statute and a suit "based" on a federal statute. In categorizing the cases not within its original jurisdiction and distinguishing the case before it from *Massachusetts v. Mellon* and *Florida v. Mellon*, the Court said:

"... Moreover, *Massachusetts v. Mellon*, and *Florida v. Mellon*, *supra*, make plain that the United States, not the State, represents the citizens as *parens patriae* in their relations to the Federal Government.

"The present controversy, however, does not fall within any of those categories. This is a civil, not a criminal, proceeding. Nor is this a situation where the United States rather than Georgia stands as *parens patriae* to the citizens of Georgia. This is not a suit like those in *Massachusetts v. Mellon*, and *Florida v. Mellon*, *supra*, where a State sought to protect her citizens from the operation of federal statutes. Here Georgia asserts rights based on the anti-trust laws." (324 U.S. at 446-447.)

Unlike *Georgia v. Pennsylvania R.R.*, this suit by Alabama on behalf of its citizens is one in which a state is attempting to protect its citizens from the effect of a federal statute, as was the case in *Massachusetts v. Mellon* and *Florida v. Mellon*. Consequently, this is an attempt by Alabama to represent its citizens in their relations with the federal government. This Alabama cannot do. In regard to these relations, the United States, not Alabama, stands as *parens patriae* to the citizens of Alabama.

Alabama also contends (Br., pp. 39-40) that *Missouri v. Holland*, 252 U. S. 416 (1920), and *Hopkins Savings Ass'n v. Cleary*, 296 U. S. 315 (1935), show that a state has standing as representative of its citizens to challenge the constitutionality of a federal statute. But neither of these cases detracts from nor weakens the clear holdings of *Massachusetts v. Mellon* and *Florida v. Mellon*.

Missouri v. Holland was decided prior to the *Massachusetts* case and was there considered by the Court to be a suit, not on behalf of citizens, but to prevent

an invasion of the right of Missouri to regulate the taking of wild game within its borders. (See *Massachusetts v. Mellon*, *supra* at 482.) And in the *Hopkins Savings* case, the Court noted a patent distinction from the facts of the *Massachusetts* case as follows:

> "... The ruling [*Massachusetts v. Mellon*] was that it was no part of the duty or power of a state to enforce the rights of its citizens in respect of their relations to the Federal Government. Cf. *Florida v. Mellon*, 273 U.S. 12. Here, on the contrary, the state becomes a suitor to protect the interests of its citizens against the unlawful acts of corporations created by the state itself." (296 U.S. at 341.)

Texas submits that the principle that the United States, not the state, represents citizens in their relations with the federal government has been strengthened, rather than weakened, by subsequent cases, and that Alabama's suit on behalf of its citizens falls squarely within that principle and is controlled by it.

Insofar As The Complaint Relates To The Fishing Rights Of Alabama Citizens, It Presents No Controversy Between Alabama Or Its Citizens And The State Of Texas

Alabama asserts that Texas is requiring Alabama citizens to pay license fees and excise taxes for fishing in the Gulf of Mexico between three and nine nautical miles from the Texas coastline and is threatening Alabama citizens with discriminatory license

fees and with complete exclusion from fishing in this offshore area.*

In support of these contentions, Alabama does not show, or even allege, instances or details. There is only the bare allegation that Texas is now requiring Alabama citizens to pay license fees and excises in the area between three and nine miles seaward from the Texas coastline. The complaint concedes that there is merely a threat with respect to discriminatory fees and taxes and the denial of the privilege of fishing in the three-mile area.

Texas submits that the circumstances presented by these allegations give Alabama no cause to complain. Considered most favorably, the action which Alabama attempts to assert on behalf of its citizens against the State of Texas is premature.

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*While Alabama's complaint does not specifically refer the Court to any Texas statute which purports to regulate fishing, on page 5 of Alabama's brief, "Article 934b-1, Vernon's Texas Statutes, 1950 Supplement, 51st Leg." is set forth as being the Texas statute under which Alabama citizens are threatened with denial of the privileges asserted in paragraph XII of the complaint.

Apparently, Alabama is referring to Article 934b-1, Vernon's Penal Code of Texas. This statute was repealed by the Texas Legislature in 1949 (Acts 51st Leg., Reg. Sess., ch. 68 § 12) after the act was held unconstitutional by a three-judge federal court in *Steed v. Dodgen*, 85 F. Supp. 956 (W.D. Tex. 1949).

Simultaneous with its repeal of Article 934b-1, the Texas Legislature enacted Article 934b-2, V.P.C. of Texas. This statute was held invalid by the Supreme Court of Texas in *Dobard v. State*, 149 Tex. 332, 233 S.W. 2d 435 (1950).

Thus, as pointed out in the *Dobard* case, the only other Texas statute in this field is Article 934a, V.P.C. of Texas, enacted in 1933, which is merely a licensing statute applying to residents and non-residents alike.

That a suit between states "should be of serious magnitude, clearly and fully proved" before this Court will take jurisdiction has been emphasized frequently. *Missouri v. Illinois*, 200 U.S. 496, 521 (1906); *New York v. New Jersey*, 256 U.S. 296, 309 (1921). And in *Alabama v. Arizona*, 291 U.S. 286, 291 (1934), the Court said:

> "... A State asking leave to sue another to prevent the enforcement of laws must allege, in the complaint offered for filing, facts that are clearly sufficient to call for a decree in its favor."

In that case, Alabama was denied leave to file a complaint in this Court to enjoin the enforcement of statutes of five other states which Alabama contended unlawfully discriminated against products made by prison labor. In holding that the complaint did not show any "direct issue" between Alabama and the defendant states, the Court said:

> "... In the absence of specific showing to the contrary, it will be presumed that no State will attempt to enforce an unconstitutional enactment to the detriment of another." (291 U.S. at 292.)

Further, this Court has expressly recognized that a mere potential threat of injury, representing only a possibility of injury in the indefinite future, is no basis for a decree in a suit between states. *Nebraska v. Wyoming*, 325 U.S. 589, 608 (1945); *Arizona v. California*, 283 U.S. 423, 462-464 (1931).

Even if it were assumed, *arguendo*, that Alabama's complaint alleged instances and details and

the existence of an imminently pending threat sufficient to show that Texas was attempting to require Alabama citizens to pay the alleged license fees and excises, and was threatening to exclude such citizens from the area, this Court should not take cognizance of the suit. For, as stated in the dissenting opinion in *Georgia v. Pennsylvania R.R.*, 324 U.S. 439, 473:

> "... It has long been settled by the decisions of this Court that a State is without standing to maintain suit for injuries sustained by its citizens and inhabitants for which they may sue in their own behalf. *New Hampshire v. Louisiana*, 108 U.S. 76; *Louisiana v. Texas*, 176 U.S. 1; *Oklahoma v. Atchison, T. & S.F. R. Co.*, 220 U.S. 277, 289; *Oklahoma ex rel. Johnson v. Cook*, *supra*, 395-396; *Jones ex rel Louisiana v. Bowles*, 322 U.S. 707."

Since any Alabama citizens who may be injured by the application of Texas fishing laws could sue on their own behalf, the Court should, under the above principle, refuse a suit by Alabama in their behalf.

SECOND OBJECTION

Alabama's Action Is in Substance and Effect Against The United States and, Consequently, The United States Is an Indispensable Party

The essence of Alabama's complaint is a challenge to the authority of the United States, under Public Law 31, to dispose of its title and proprietary interest in lands, minerals, and other natural resources

of the marginal sea. All of the relief sought by Alabama directly involves the national sovereign's paramount rights, dominion, and power over this property. Under these circumstances, it is clear that the United States is a real party in interest since the nature of its tenure is controlling.

The Court has consistently held that in deciding whether a suit involving title or property rights is actually one against the United States, the pleadings must be tested by considering whether the relief sought, if granted, would determine rights of the United States. *Oregon v. Hitchcock*, 202 U.S. 60 (1906); *Louisiana v. Garfield*, 211 U.S. 70 (1908); *Minnesota v. United States*, 305 U.S. 382 (1939).

Such being the rule, it is apparent that the United States is the real and substantial defendant in the present case. Since the United States has given no consent in this instance and the complaint would have to be dismissed if permitted to be filed, the Court should deny leave to file the complaint. *Louisiana v. McAdoo*, 234 U.S. 627, 628 (1914).

CONCLUSION

The complaint states no case or controversy within the jurisdiction of this Court since it presents only a political question and fails to show that Alabama has standing to sue either as sovereign or on behalf of its citizens. Furthermore, jurisdiction should not be taken because the United States is an indispensable party and has not been joined.

WHEREFORE, the motion for leave to file the complaint should be denied.

Respectfully submitted,

JOHN BEN SHEPPERD
Attorney General of Texas

ROBERT S. TROTTI
First Assistant Attorney General

JESSE P. LUTON, JR.
Assistant Attorney General

WILLIAM H. HOLLOWAY
Assistant Attorney General

PHILLIP ROBINSON
Assistant Attorney General

December, 1953

CERTIFICATE OF SERVICE

I, William H. Holloway, certify that I have served a copy of the foregoing motion for leave to file objections and objections of State of Texas to motion of State of Alabama for leave to file complaint on the following named individuals by mailing a copy of same to them, postage prepaid, to the following addresses:

Hon. Si Garrett
Attorney General of Alabama
State Capitol
Montgomery, Alabama

Hon. Edmund G. Brown
Attorney General of California
State Capitol
Sacramento, California

Hon. Fred S. LeBlanc
Attorney General of Louisiana
State Capitol
Baton Rouge, Louisiana

Hon. Richard W. Ervin
Attorney General of Florida
State Capitol
Tallahassee, Florida

Hon. George M. Humphrey
Secretary of the Treasury
Department of the Treasury
Washington, D.C.

Hon. Douglas McKay
Secretary of the Interior
Department of the Interior
Washington, D.C.

Hon. Robert B. Anderson
Secretary of the Navy
Department of the Navy
Washington, D.C.

Hon. Ivy Baker Priest
Treasurer of the United States
Department of the Treasury
Washington, D.C.

Hon. Herbert Brownell, Jr.
Attorney General of the
United States
Department of Justice
Washington, D.C.

WILLIAM H. HOLLOWAY

State of Texas, County of Travis

Subscribed and sworn to before me this _____ day of December, 1953.

Notary Public in and for said
County and State.